

DISTRICT OF COLUMBIA
PUBLIC SCHOOLS ENROLLMENT
OCTOBER 7, 2003



TCBA

THOMPSON, COBB, BAZILIO & ASSOCIATES, PC
Certified Public Accountants & Management, Systems and Financial Consultants

1101 15th Street, NW Suite 400 Washington, DC 20005
PH 202.737.3300 • FX 202.737.2684 • www.tcba.com



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Executive Summary

Thompson, Cobb, Bazilio & Associates, PC (TCBA) was retained by the State Education Office of the District of Columbia (the SEO) to conduct a full census-type audit of the October 7, 2003, student enrollment for the District of Columbia Public Schools (DCPS) and public charter schools. In addition to the enrollment verification, TCBA reviewed each student file to ensure that it contained proper documentation to support residency, special education, and English language proficiency designations. This report presents the results of the DCPS census-type audit only; public charter schools are reported separately.

This was the third year that a 100% verification of student enrollment and residency files was conducted. As shown in Chart 1, the annual DCPS enrollment continues to decline, while the number of special education students placed in non-DCPS schools (Tuition Grant) continues to increase.



Chart 1: 5-Year Enrollment Trend (DCPS and Tuition Grant Students - per DCPS)

It is the nature of these reports to bring attention to discrepancies and improper adherence to policies. However, we would like to commend those schools that had no or few enrollment or residency issues remaining after the resolution process, signifying good administrative practices and cooperation with the census process. Schools with no differences are:

Amidon Burrville
Kenilworth Maury

Brent	Ferebee-Hope
Key	Meyer
Cleveland	Houston
LaSalle	Miner
Cook, JF	Janney
Merritt	Montgomery
Patterson	Payne
Peabody	Reggio Emilia
Shaed	Shepherd
Stevens	Stoddert
Terrell, MC	Walker-Jones
West	Wheatley
Garnett-Patterson	Banneker
Dunbar Pre-Engineering	Rose
DC Alternative	Prospect
Hamilton Center	Moten Center

The SY 2003 - 2004 Official Membership Report published by DCPS reflects a total of 65,099 students as of October 7, 2003, consisting of 62,494 students enrolled in pre-school, pre-kindergarten, kindergarten, grades 1 through 12, and non-grade

level programs in DCPS. In addition, 2,605 special education students were included whose tuition for enrollment in other schools is paid with funds available to DCPS (Tuition Grant). The results of the census-type audit verified:

- 61,567 students enrolled in pre-school, pre-kindergarten, kindergarten, grades 1 through 12, and non-grade level programs in DCPS, and

- 2,483 special education students whose tuition for enrollment in other schools is paid with funds available to DCPS.

Of the 61,567 students verified as enrolled in DCPS programs, other than Tuition Grant, we found:

- 160 students present and attending at October 7, 2003, who were not in SIS
- 617 students for whom residency verification was inadequate
- 57 students who have been assessed non-resident tuition
- 8,230 students who receive special education services
- 5,075 LEP/NEP students

ENROLLMENT

Our student count as of October 7, 2003 (excluding Tuition Grant) was 61,567 without regard to residency and 60,950 for students with verified residency.

The enrollment count was based primarily on verification of the student's presence in the school. For students who were not present on the day of the count, we relied on the enrollment and attendance records provided by the school and assumed those documents to be accurate and complete.

Table 1 shows the audited enrollment count for DCPS students compared to the enrollment reported by DCPS. DCPS established criteria

through various memoranda and guidelines for determining and reporting membership. Our examination was conducted with reference to the procedures as they applied to DCPS. (See Table 2 for the breakdown of students' residency status.)

Although the SIS download provided by DCPS on October 7 should be the same data from which the Membership Report was derived, we identified a few discrepancies. We also identified manual changes made to the data in the preparation of the Membership Report. Many of the manual changes were captured during the audit process. The figures shown in the tables and attachments are based on the October 7 SIS download provided to TCBA. The following adjustments are needed to reconcile to the Membership Report.

"Reported" enrollment shown in tables and attachments	62,452
Elementary Schools	(1)
Junior High Schools	(1)
Middle Schools	(2)
High Schools (excluding Eastern	(15)
Eastern High	57
Alternative Education Schools	1
Special Education Schools	3
	<u>62,494</u>

The difference of 57 at Eastern was due to enrolled students not being in SIS as of October 7, 2003. These students were accounted for in the audit as appropriate.

DCPS	Students Present	Absent and Counted	Total	Membership Report	Difference
Total Enrollment	54,108	7,459	61,567	62,452	(885)
Enrollment with Verified Residency	53,673	7,277	60,950	62,452	(1,502)

Table 1: Enrollment Comparison

	2003 - 2004		2002 - 2003	
	Audited Enrollment with Verified Residency	Audit as a Percentage of Reported	Audited Enrollment with Verified Residency	Audit as a Percentage of Reported
Alternative	207	97%	192	96%
Elementary	38,746	99%	40,568	99%
Middle	4,501	97%	4,637	95%
Junior	4,994	98%	5,035	97%
High	11,492	94%	11,997	95%
Special Education	1,010	96%	940	91%

Table 2: Comparison to Prior Year

On October 2, 2003, there was a mercury spill at Ballou High School that caused the building to be closed until November 5, 2003. During that time, students were dispersed to other locations. Because staff of Ballou High School and Ballou STAY did not have access to the records, the Student Information System (SIS) could not be updated. Also, regular attendance recordation procedures may not have been in place. This lack of reliable documentation may have resulted in a decrease in the number of students for whom enrollment, attendance, and residency documentation could be verified.

RESIDENCY

Residency verification continues to be an issue in the District. Of the 61,567 students found to be enrolled, there were 617 students for whom proof of residency provided to the auditors was inadequate or unavailable. However, for the majority of these students, SIS showed that proper residency documentation had been obtained. This signifies weaknesses in both the

procedures for obtaining valid proof as well as the procedures for maintaining accurate student information.

We reviewed the District Residency Verification Form (Residency Form) for every student included in the census, to the extent available. For purposes of the audit, a properly completed and signed Residency Form was considered to have been completed in accordance with the applicable rules. During the initial review, we identified students for whom we had not seen adequate residency documentation. The principals were given an opportunity to provide the missing information. Table 3 summarizes the final results of the residency review. The "Not Verified" column includes students for whom we were not provided the necessary documentation to make a determination of residency status. (See Attachment 9.)

There are 58 students who have been assessed non-resident tuition. However, one of these stu-

	Resident	Non-Resident Paying Tuition	Non-Resident Not Paying Tuition	Not Verified	Total
DCPS Schools	60,893	57	2	615	61,567
Tuition Grant	2,326	-	-	157	2,483

Table 3: Residency

dents was found to be "Not Enrolled". Table 4 is a summary of the tuition assessments for the 58 students identified by DCPS as non-resident students. In addition, we identified two students for whom the documentation provided indicated Maryland residency, but no tuition has been assessed.

This report includes both quantitative enrollment data as well as qualitative observations. Only those students who are District residents, or pay tuition, are considered properly enrolled. Therefore, the enrollment data is presented in two ways - enrollment without regard to residency and enrollment only for students who have properly proven residency or who pay tuition. The quantitative data is presented in the following attachments:

ATTACHMENTS

1. Summary of Audited Enrollment by School Type and Grade.
2. Audited Enrollment by School and Grade
3. Summary by School Type and Grade: Audited Enrollment vs. Reported Enrollment
4. Summary by School and Grade: Audited Enrollment vs. Reported Enrollment
5. Summary of Students for Whom Enrollment and Residency were Verified By School Type and Grade
6. Summary of Students for Whom Enrollment and Residency were Verified By School and Grade
7. Summary of Students for Whom Enrollment and Residency were Verified by School Type and Grade: Audited Enrollment vs. Reported Enrollment

Grade	Number of Students	Tuition Assessed (per DCPS)
Pre-Kindergarten and Pre-School	2	15,020
Kindergarten	4	26,444
1st	1	6,611
3rd	1	6,611
4th	2	12,838
6th	1	6,611
8th	1	6,611
9th	12	90,120
10th	16	120,160
11th	8	53,032
12th	10	75,100
Total	58	419,158

Table 4: Tuition Assessments



8. Summary of Students for Whom Enrollment and Residency were Verified by School and Grade: Audited Enrollment vs. Reported Enrollment
9. Summary of Residency Verification by School
10. Summary of Students with IEPs, Including Students for Whom Residency was not Verified
11. Summary of LEP/NEP Students by School, Including Students for Whom Residency was not Verified
12. Summary of Students with IEPs, Including Students for Whom Residency was not Verified - Aligned to Proposed Funding Formula Legislation
13. Summary of Students with IEPs for Whom Enrollment and Residency were Verified
14. Summary of LEP/NEP Students with Verified Residency
15. Summary of Tuition Grant Enrollment by School

The qualitative findings are discussed in detail in the Observations section of this report. Many of the anomalies that we discovered during the census-type audit can be addressed through a few comprehensive recommendations. Some of these recommendations were made last year; based on our review this year, we believe they bear repeating.

RECOMMENDATIONS

Many of the deficiencies noted last year are repeated this year. This is not to say that there have not been improvements. There seemed to be a more widespread understanding of the correlation between the audit and funding, and therefore, the importance of the audit, but many schools continue to have the same problems year to year. In summarizing our observations, there are three themes that continually arose.

1. Leadership
2. Consistency
3. Training

Not surprisingly, the schools that appeared to have strong leadership were the easiest to audit. The records were in good order, the staff was cooperative, and the principal participated. However, there were still many schools where the principal did not participate in the audit process, and his or her attitude transferred to the staff. We suggest that the audit process begin before enrollment begins for the following school year. A common phrase heard during the audit was "no one told me." By orienting principals to the process and document requirements at the front-end rather than after the fact, the process may be less adversarial and yield better results.

There is little consistency, particularly in attendance reporting. If standards were established, administrative tasks could be streamlined and record accuracy improved. The current attendance taking process is archaic. It is not unusual to have three records of attendance for the particular student, none being the same. There is the daily student record, the weekly classroom attendance roster, and the attendance record in SIS. Examples are provided later in the report that demonstrate various types of errors identified in the attendance records.

An accurate enrollment count is necessary for funding. While a census-type audit is currently mandated, one objective is to be able to modify the audit to place more reliance on the information in the DCPS systems. In order for this approach to be successful, controls would have to be in place and operating to ensure data integrity. Such controls would include standardization of procedures, automated attendance tracking, and periodic auditing of attendance records.



The principals we interviewed stated that training is offered several times a year on SIS and residency verification, yet we repeatedly encountered principals or staff who claimed not to know that residency had to be verified after July 1 or that receipts were required when using leases or utility bills to prove residency. Many believed these to be requirements imposed by the audit rather than the established rules for verifying residency. For special education students, we saw various interpretations for completing and amending IEPs. Although the training is being done, it may not be effective. DCPS should consider using a training specialist to assess the overall training programs to determine:

- Are the right people being trained?
- Does the training schedule accommodate turnover or job shifting?
- Are the format and materials structured to reach people with varied learning habits?

RESIDENCY

We recommend that the SEO undertake a project to revamp the process used to verify residency. The current process is burdensome to the school staff and the parents. It can also be circumvented and is not strictly adhered to by all schools. As recommended in previous years, we believe that the objectives of residency verification can be achieved more efficiently and thoroughly through one, or a combination, of the following:

1. Automated matching of files available in systems throughout the District, such as the Office of Tax and Revenue, the Department of Human Services, or the Department of Motor Vehicles;
2. Establishing central centers for residency verification; and
3. Outsourcing.

If these methods cannot be implemented, we recommend that the SEO:

1. Rescind the May 25, 2001, directive and require that schools maintain copies of the documents used to prove residency, if privacy regulations allow;
2. Conduct periodic audits of the residency files to ensure compliance with the residency verification rules; and
3. Develop and distribute guidance for residency verification (discussed in detail in the Observations section of this report).

SYSTEM MAINTENANCE

In each of the past audit reports, we have cited deficiencies in the design of SIS and data integrity. To some extent, we have noted improvements each year, particularly the decrease in duplicate students within SIS. However, in attempting to work around the SIS deficiencies, DCPS has created a bigger problem. *There is no single system of record.* There are, currently, at least three systems of record. In addition to SIS, the Office of Special Education maintains the Special Education Tracking System (SETS) and the Office of Bilingual Education (OBE) maintains a separate system to track language services (the OBE System). These three systems interface through downloaded files rather than real-time connectivity, and, as documented throughout this report, there are numerous differences between the systems. Therefore, there is no one system from which to obtain and report student information. Depending on the information being reported it is likely that data taken from any one system is unreliable.

In order to conduct the audit using the most accurate data, we obtained downloads of active students as of October 7, 2003, from SIS, SETS, and the OBE System. Upon merging these files, we found:



- 354 students in the OBE data with no matching student ID in SIS
- 5 DCPS students in the SETS data with no matching student ID in SIS
- 179 Tuition Grant students in SETS without a matching student ID in SIS
- 48 Tuition Grant students shown as special education in SIS without a matching student ID in SETS

These three systems track only DCPS students. Because there is no comprehensive system incorporating the public charter school students, the District has no means to track and monitor all of the students served by the District. This impacts the District's ability to determine a true enrollment number, including special and bilingual education students; a school's ability to know whether a transferring student requires special or bilingual education; and a school's ability to schedule a transferring student appropriately.

The D.C. School Reform Act of 1995, as amended, required the Superintendent to submit a long-term reform plan that addressed, among other things, the steps necessary to establish an electronic data transfer system. This system, as defined, should be designed for the maintenance and transfer of student records among District of Columbia public schools and public charter schools. DCPS is in the process of implementing a new student information system. We recommend that the SEO:

- Determine if the plan for a comprehensive system was developed and determine if the system being implemented meets the requirements of the plan;
- Monitor implementation of the plan.
- Work with the Chartering Authorities to bring charter schools onto the system.

Accurate information can only be achieved through the implementation and maintenance of one system of record to include DCPS and public charter schools and incorporates all users, including OSE and OBE. If separate systems are maintained for specific purposes, i.e. OSE and OBE, these feeder systems should interface with the primary system and have safeguards in place to ensure that they reconcile.

OFFICIAL ENROLLMENT DATE

The enrollment date of October 5, or the closest school day, is established by the Public School Enrollment Integrity Act of 2001 in order to establish an enrollment number on which to base the subsequent year budget. This date, therefore, is driven by the requirements of the budget process. However, a more accurate count would likely be achieved if the official enrollment date were set later in the year, such as February. There is a high degree of student mobility during the first month of schools as parents settle between DCPS or charter schools, charter school wait lists fill, and out-of-boundary slots fill. There are numerous instances of transfers and withdrawals shortly before and after the October date each year. Because there is no comprehensive information system, the movements in and out of DCPS and charter schools cannot be timely tracked. By moving the official enrollment date to a later period, there would be a more stable student population. Also, according to principals at the STAY schools, the later date would better reflect their enrollment. The STAY schools provide evening adult education. Because many of the adult students rely on seasonal employment during the holiday season, they forego fall enrollment and attend in the spring semester. Thus, there is an increase in STAY school enrollment each January, which is not reflected in the October enrollment count.



Under the current requirement for a 100% audit, moving the date would be problematic for the budget process. However, if the new system and related controls will eventually allow for a streamlined audit process, the District should consider a later date.

STUDENTS ENROLLED IN MULTIPLE PROGRAMS

The Uniform Per Student Funding Formula provides for funding to students in adult education programs and ungraded students in high school programs. However, it does not address students who attend multiple programs. This affects the three DCPS STAY schools - Spingarn, Roosevelt, and Ballou - as well as one charter school - Booker T. Washington. Currently, students who attend a day school program and an evening program are included in the enrollment count of only the day school. We recommend that the SEO review the policies regarding funding for students in multiple programs.

Observations

RESIDENCY

Verifying residency continues to be an issue in the District. The DCPS Office of the Superintendent issued a directive dated May 25, 2001, that schools are not to keep copies of the residency proofs; therefore, the audit process was limited to determining if the school had completed the required Residency Form. However, the fact that a completed form is on file does not guarantee that valid proof was provided. After the initial review, we gave the principals an opportunity to provide the proof of residency for students for whom the Residency Forms were incomplete or missing. In reviewing the documentation provided, we found that the residency requirements are not being strictly adhered to. For instance, when accepting leases and utility bills as proof of residency, the cancelled checks or receipt of payment are often not included. Many principals claimed that they were unaware of this requirement although it is clearly stated on the Residency Verification Form.

Proof of Residency Missing for Some Enrolled Students

Of the 61,567 students included in TCBA's enrollment count of students in pre-school, pre-kindergarten, kindergarten, grades 1-12, and non-grade level programs in DCPS, the residency status of 617 students was classified as "not verified" or non-resident not paying tuition. In some cases, Residency Forms were on file but missing vital information, such as the check-off

for the required proof or the school official's signature. Students for whom adequate documentation was not provided during the resolution process remained as "Not Verified". Table 5 compares the 617 students for whom proof of residency was inadequate to the residency verification code in SIS, highlighting the integrity concerns with SIS data.

We identified 154 students with addresses other than the District, of whom SIS showed 10 as residents or had a blank residency code. The remaining were shown as either Non-Resident or Ward of the District.

Residency Rules Should Be Reconsidered

In June 2001, the SEO issued rules regarding residency verification. These rules established the documentation required to prove residency for the purpose of school enrollment. We recommend that the SEO develop and distribute guidelines to eliminate inconsistencies and clarify requirements. Specifics to be considered include:

- Clarification of documentation requirements to prove payment of D.C. taxes. The Residency Form lists forms W-2 and 1099 from the previous year. Although the rules state that a tax return is not acceptable, this is not stated on the Residency Form. We saw many instances of a Federal tax return being accepted although it shows no evidence of payment of District taxes.

SIS Residency Code	No Residency Form	Form Incomplete	Nonresident	Total
R, X, P, or E	212	377	2	591
Blank	16	10		26
TOTAL	228	387	2	617

Table 5: Comparison of Unverified Residency to SIS



- The use of a prior year W-2 is inconsistent with the requirement that a pay stub be issued within 45 days of proving residency. During the time of enrollment, the W-2 will be 6 - 10 months old. The current pay stub is better evidence of current residency.
- Guidance on what constitutes "current official documentation of financial assistance received from persons enrolling the student from the Government of the District of Columbia". Absent guidance, school staff are accepting a variety of documents. Supplemental Security Income is listed as an example, although this is not assistance from the District Government, so letters from the Social Security Administration are accepted. We have seen photo identifications from the Department of Human Services dated as far back as 1987 and copies of envelopes from different District offices.
- Inclusion of the use of embassy letters. Based on oral approval from the Office of Residency, schools are accepting letters from embassies to verify residency. However, many of these letters state only that the student's parents are employees of the embassy rather than living at the embassy. Further, the rule should define those entities considered to be embassies; we have seen letters from organization such as the Center for Hellenic Studies.
- Acceptable documentation for wards of the District. We have seen a number of letters from non-profit organizations that operate foster care networks.
- Clarification of acceptable utility bills and that another form of proof is required when one is a utility bill. The Residency Form excludes telephone bills, but should also

address utility-type bills, such as cable television.

- Reinforcement of the requirement for receipts with utility bills and leases and clarification that the receipt is intended to show that payment is being made by the person enrolling the student. We saw many instances where a credit amount on the invoice is being accepted as proof of payment. More often, however, we found that the requirement for receipts was overlooked.
- Emphasis on the requirement that residency be verified after July 1 each year for those students enrolled through the April early registration for Pre-Kindergarten and Kindergarten.
- Reduction in the 45 days allowed for a principal to conduct a home visit. Parents have 10 days after enrolling a child to prove residency. If unable to provide the documents, they have the option of consenting to a home visit. The principal then has 45 days to conduct the home visit. Therefore, a student can be enrolled for 55 days before residency is verified.

Policy Not Adhered to for Withdrawing Students

The guidelines require that students for whom the required proofs of residency are not obtained prior to the official membership date, or within 10 days after the enrollment date, be withdrawn from school and excluded from the count. In our initial review of Residency Forms, we found over 300 lacked the proper number of proofs. Therefore, under the guidelines, these students should have been withdrawn.



ATTENDANCE

Students Absent on the Day of the Count

Absenteeism continues to be high in some of the schools. DCPS policy is to withdraw any student who is absent for 20 consecutive days. Our findings indicate that this policy was not always complied with.

Table 6 summarizes the absentee rate for schools on the day that we performed the student counts.

School Type	Total in Enrollment Data	Absent on the Day of the Count	Percentage
Alternative	214	86	40%
Elementary	39,162	3,342	9%
Junior High	5,112	800	16%
Middle School	4,640	711	15%
Senior High	12,269	3,345	27%
Special Education	1,055	212	20%
Total DCPS	62,452	8,496	14%

Table 6: Absenteeism Rates

Note: Absentee rates are based on the Enrollment Data as provided rather than the final census.

Table 7 highlights schools with particularly high absentee rates.

Exception Based Attendance

SIS tracks attendance on an exception basis, that is, only days when a student is other than "Present" are captured in SIS. Therefore, if a student has perfect attendance, the SIS attendance screen will be blank. This does not provide the schools with adequate information to monitor attendance. For instance, the same blank screen could indicate that the student was never included on any attendance rosters (not assigned a homeroom) or that the student was a "no-show". Accuracy of SIS attendance data is absolutely necessary in determining whether a student is actually enrolled at a given school. This can be seen most clearly when looking at

duplicate records. The combined Enrollment Data provided by DCPS and the public charter schools contained the following (not mutually exclusive):

- 4,861 students with matching names, i.e., at least 2 students have exactly the same name;
- 918 students with matching student ID numbers;
- 8 students at two different schools within SIS

- 220 students with a combination of matching name and date of birth
- 202 students with a combination of matching name and student identification number
- 21 students enrolled at both a DCPS or public charter school and a Tuition Grant school (per SIS)
- 47 students enrolled at both a DCPS or public charter school and a Tuition Grant School (per SETS)

In conducting the census, we had to determine, to the extent possible, those students from the above populations who were in fact the same student being shown as enrolled at two different schools. The attendance records are the primary source for making that determination. However, because the attendance records are exception based and not always maintained on a daily basis, it is possible for students to appear to be attending two different schools.

School	Percentage
Oak Hill Academy	42%
Drew	7%
Langdon	7%
Randle Highlands	10%
Shadd	13%
Slowe	12%
Winston EC	23%
Terrell JHS	19%
Evans Middle	32%
Johnson Jr. High	24%
Anacostia SHS	34%
Ballou SHS	40%
Ballou Stay	61%
Cardoza	23%
Coolidge	27%
Eastern	23%
Moore Academy	45%
Roosevelt Stay	60%
Spingarn	37%
Spingarn Stay	50%
Washington Center	50%
Washington MM	18%
Woodson	35%
DC Learning Academy	40%
Hine	22%
MacFarland	27%
Roosevelt	26%
Woodrow Wilson	25%
Browne	23%

Table 7: Significant Absenteeism Rates by School

Attendance Not Recorded Daily

In researching how a student can appear to be in attendance at two different schools, we were told that schools may not record attendance in SIS daily. Because of scanner failures, SIS being down, or workload, the attendance sheets may not be input. One high school admitted that they don't bother to record attendance for students with repeated absences. Therefore, because SIS records attendance on an exception basis, all students would appear to be present on days when no information is input. There are also several schools that do not record attendance in SIS.

Attendance Documentation Procedures Should be Standardized

While there are some basic standards established, e.g. attendance is to be taken daily and submitted by a certain time each day, there is no standard in use as to the form that the documentation should take. The attendance record card does prescribe the format shown below, but it is difficult to read (and write) and, therefore, not used.

Several principals expressed to us that they do not require standard documentation because teachers need flexibility. While flexibility is

HOLIDAY ☐ H ABSENT A.M. ☐ P.M. ☐ ALL DAY ☐ TARDY A.M. ☐ P.M. ☐ A.M. AND



important to the ability to teach, it should not apply to administrative practices. Some of the inconsistencies between the SIS attendance records and the teachers' attendance records could result from the office staff having to interpret each teacher's individual method for documenting attendance. On the attendance cards that we reviewed, we have seen "present" documented as any of the following: "P", blank, check mark, dot, grade, and time.

We recommend that DCPS establish a standard form and practice for documenting attendance and require all teachers to use it. The standard should be easy to document, read, and interpret. For instance, "A" for Absent, "P" for Present, "T" for Tardy, and "S" for suspension. The standard should be comprehensive enough to cover the various attendance categories required for reporting, but not so cumbersome that it isn't used, such as the one above.

Ideally, the school system will be able, eventually, to move to automated attendance taking through the use of bar codes on student IDs or on-line access in the classroom.

Students not Withdrawn for Excessive Absence

Aside from the role that attendance monitoring plays in student performance, there are funding issues. DCPS policy requires that students absent for 20 consecutive days be withdrawn. This policy is not enforced because, in part, SIS may not be providing a true record of absences. Students are being carried in enrollment who have actually transferred to other schools. Of the 8,496 students absent on the day of the count, we determined that 1,037 were not attending on October 7th, either because they were found to have withdrawn (or stopped attending) prior to October 7th, were found to be attending another school, or attendance documentation, if provided, did

not provide clear evidence of enrollment. While this would be detected in SIS if they transferred to another DCPS school (a duplicate record would be created), there is no means for detecting students who transferred to a public charter school or a school outside of the District. There were originally 8 pairs of students with duplicate records in SIS. When we combined the SIS records with the enrollment rosters provided by the public charter schools, we identified an additional 223 pairs of students listed as enrolled in both DCPS and public charter schools or two charter schools.

We recommend that DCPS investigate a more effective means for gathering attendance information. Recording attendance every day rather than on the exception basis will provide better information for attendance monitoring and enrollment. Also, DCPS could expand the use of student ID cards to make attendance and enrollment data more accurate and efficiently obtained. Since ID cards are barcoded, they can be used to scan attendance and enrollment. This is currently being done with great success at several schools.

Withdrawal and Transfer Dates not Accurate

The student population is transient. As a result, an SIS generated enrollment report at any given point in time will have a degree of inaccuracy. To some extent, these inaccuracies are not errors on the part of the school staff. One contributing factor to the differences noted between the DCPS Reported enrollment and the audited enrollment as of October 7 is the fact that the audit is conducted subsequent to October 7. Therefore, the audit has the benefit of information not available to the school. Frequently a student will be absent for some number of days before the parent officially withdraws the student. In some cases, the student is never officially with-

drawn but is dropped from the roster after 20 consecutive absences. In either case, the school may not have enough information on October 7 to know that the student will not be returning.

Because the objective of the audit is to determine the number of students enrolled as of October 7, we consider subsequent information to make that determination. Because the audit has access to the enrollment records for all schools, including public charter schools, we are able to determine if a student had, in fact, withdrawn or transferred prior to October 7.

Following are examples of documents provided by the schools that demonstrate the attendance recordation problems discussed above. Names of students are not shown, but each example is for a particular student.

Withdrawal form and SIS show withdrawal date of October 17; attendance card notes transfer date of October 3, with no absences recorded.

10. DATE OF LAST ATTENDANCE: 10-17-03
MONTH DAY YEAR

11. EFFECTIVE DATE OF WITHDRAWAL: 10-17-03
MONTH DAY YEAR

Withdrawal Date: 10/17/03

SIS Student Master Record

HOLIDAY		ABSENT A.M.		P.M.		ALL DAY		TARDY A.M.		P.M.		A.M. AND P.M.																				
<input checked="" type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>																				
DATE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	TOTAL DAYS ABSENT
SEPTEMBER																																0
OCTOBER																																0
NOVEMBER																																0
DECEMBER																																
JANUARY																																
FEBRUARY																																
MARCH																																
APRIL																																
MAY																																
JUNE																																

Use reverse side for special notations

* Transferred 10/3/03

Attendance Records for the Same Student at a DCPS School and a Charter School

DATE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	TOTAL DATE ABSENT
SEPTEMBER																																
OCTOBER	X		X				X	X						X								X										
NOVEMBER																																
DECEMBER																																
JANUARY																																
FEBRUARY																																

09-02-2003	PRESENT*
09-03-2003	PRESENT*
09-04-2003	PRESENT*
09-05-2003	PRESENT*
09-08-2003	PRESENT*
09-09-2003	PRESENT*
09-10-2003	PRESENT*
09-11-2003	PRESENT*
09-12-2003	PRESENT*
09-15-2003	PRESENT*
09-16-2003	PRESENT*
09-17-2003	PRESENT*
09-23-2003	PRESENT*
09-24-2003	PRESENT*
09-25-2003	PRESENT*
09-26-2003	PRESENT*
09-29-2003	PRESENT*
09-30-2003	PRESENT*
10-01-2003	PRESENT*
10-02-2003	PRESENT*
10-03-2003	PRESENT*
10-06-2003	PRESENT*
10-07-2003	PRESENT*
10-08-2003	PRESENT*
10-09-2003	PRESENT*
10-10-2003	PRESENT*
10-14-2003	PRESENT*
10-15-2003	PRESENT*
10-16-2003	PRESENT*
10-17-2003	PRESENT*
10-20-2003	PRESENT*
10-21-2003	PRESENT*
10-22-2003	PRESENT*
10-23-2003	PRESENT*
10-24-2003	PRESENT*
10-27-2003	ABSENT
10-28-2003	ABSENT
10-29-2003	PRESENT*

Charter

Withdrawal date, classroom attendance, and SIS attendance are each different.

DATE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	TOTAL DATE ABSENT
SEPTEMBER	X	X	X	X				X	X			X	W	W						W	W											7
OCTOBER	X	X	W	W							W	W				X	X	W	W													11
NOVEMBER	Withdrawn																															
DECEMBER																																

Date: Abs Type:
 09/02/03 A Absent
 09/11/03 A Absent
 09/12/03 A Absent
 09/15/03 T Tardy
 09/16/03 A Absent
 09/17/03 A Absent
 09/23/03 T Tardy
 09/24/03 A Absent
 09/30/03 A Absent
 10/01/03 A Absent
 10/06/03 A Absent
 10/07/03 A Absent
 10/08/03 A Absent

Withdrawal Date: 11/06/03

Student was absent every day, but teacher's use of slash mark would incorrectly indicate only Absent A.M.

HOLIDAY ☒ ABSENT A.M. ☒ P.M. ☒ ALL DAY ☒ TARDY A.M. ☒ P.M. ☒ A.M. AND P.M. ☒

DATE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	TOTAL DAYS ABSENT
SEPTEMBER	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
OCTOBER	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
NOVEMBER	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
DECEMBER	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
JANUARY	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
FEBRUARY	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
MARCH	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
APRIL	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
MAY	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
JUNE	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		

Use reverse side for special notations



Attendance for 2003 documented on an August 1997 calendar

4 5 6 7 8 9 11 13 14 15 16 18 19 20 21 22 23 25 26 27 28 29 30	17	
19	20	
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Non-DCPS Day and Residential Programs (Tuition Grant)

Students with special needs who have been placed in schools outside of DCPS, including day and residential programs and surrounding counties, for whom tuition is paid by DCPS are referred to as Tuition Grant students. Using school information provided by the DCPS Division of Special Education, we sent letters to each of the non-DCPS schools requesting enrollment information as of October 7, 2003. Table 8 summarizes the results.

that did not respond to the confirmation request. Because of the large number of students attending these schools, we attempted to verify these students through alternative means. Since the students who attend schools in surrounding counties do so because they are in foster homes outside of the District, we obtained a report from the D.C. Child and Family Services Agency (CFSA) of all children in foster care. We accepted a basic premise that a child in foster care would be attending some school to which the District paid tuition. Therefore, if the student data obtained from DCPS for students in County

	Reported	Confirmed
Students in SIS, October 7, 2003:	2,613	-
Confirmed by schools		2,178
Agreed to CFSA data		154
Students in SETS but not SIS, agreed to CFSA		54
Students confirmed by schools not in SIS		97
Duplicates (a)	(8)	-
Total Tuition Grant Students Reported	2,605	2,483
Not Funded by DCPS (b)	(89)	-
Total Tuition Grant Students	2,516	2,483

Table 8: Tuition Grant Confirmation Results

(a) There were 8 duplicates in SIS data showing students at both a DCPS school and a non-DCPS school. (b) 79 students attending Kendall-Gallaudet and Kendall Green are federally funded, so should not be included in the number reported for students in non-DCPS schools for which DCPS is paying tuition. There were also 10 students enrolled in other facilities not funded by DCPS.

Several of the surrounding counties do not invoice the District until late January. As a result, there was no documentation available to support enrollment for students attending county schools

schools agreed with the CFSA report, we counted those students as enrolled. For verification of residency, we noted any student on CFSA's report as a ward of the District. We did no work to verify the accuracy of the CFSA report.

The Tuition Grant enrollment includes special education students placed in foster care in surrounding counties who are attending county schools. There are also regular education students in foster care attending surrounding county schools. Information for those students was not available and has not been included in this report.



For the confirmations received from the schools, we compared each student reported as attending that school to the student data in SIS. We reviewed the discrepancies with the DCPS Special Education Division and obtained documents to resolve the differences. There were 87 students listed on the confirmations that DCPS agrees were not in SIS or SETS but are enrolled. Included in the documentation provided by DCPS were invoices supporting the fact that schools billed for students not in SIS/SETS. Therefore, there is a possibility that DCPS may be being billed for students for whom they do not have records of placement. The DCPS Division of Special Education has been working to clean up the SIS and SETS records and reconcile the results with the enrollment rosters we received from the schools. That process is ongoing.

These issues are not merely a matter of data tracking. They impact all of the following:

- **Fiscal** DCPS may be paying for students who have not been properly placed or have withdrawn from school. The confirmation results indicated that the schools have students enrolled who are not recorded as well as students in SIS and SETS who may not be attending the schools. The number of discrepancies noted suggests that the billings from the schools are not being reconciled to the records maintained by DCPS Special Education Office.
- **Operational** DCPS records of student placements do not appear accurate. We understand that there can be frequent movement of students among schools, but practices must be in place to track these movements both from a logistics standpoint and to ensure that the movement is in the best interest of the child.
- **Strategic** Special education costs are one of the major components of the DCPS budget.

As DCPS moves forward with developing strategic plans to reduce the costs and improve performance, an accurate counting of student placement and related cost is critical, including those students for whom DCPS provides services but does not fund.

DCPS Records are not Consistent with CFSA Records

As discussed above, there are children in foster homes outside of the District who attend schools in the surrounding counties. In performing the alternative procedures for verifying these students, we obtained a download of the data for foster children from the CFSA system. In comparing the two systems, we noted numerous differences in the student's information, such as school attending. There were also 144 students in SIS and/or SETS who were identified as attending a county school but who could not be verified against the CFSA data. Because the purposes of DCPS and CFSA in serving these children are entwined, processes and controls should be developed to ensure that each child's location and service needs are maintained and updated by each agency on a timely basis. These procedures can range from shared systems to basic manual controls, such as system change documents being required and distributed.

Residency Verification for Tuition Grant Students

The DCPS Office of Residency performs residency verification for Tuition Grant students in private placements, but only for those who are not wards of the District. When OSE learns that a student is a ward, they code SIS with an "X". OSE may not always receive written notification that the student is a ward; it is often by phone. If the Office of Residency sees that the SIS code is "X", they do not obtain documentation. The res-

idency verification rules require that a ward of the District enrolling in a DCPS school provide documentation from the court. To be consistent, the same level of verification should be required for students attending Tuition Grant schools.

Invoice Approval Relies on SETS Accuracy

Previously, Placement Specialists within OSE approved invoices for payment of Tuition Grant students. The Placement Specialists were knowledgeable about each student and were in the best position to approve invoices. Due to the resource demands, Placement Specialists no longer approve invoices. The OSE staff who currently approve invoices rely on the information in SETS to determine whether a student attends a particular school. Given the discrepancies noted in the audit between SIS and SETS, SETS and CFSA, and SETS and the school responses, we recommend that controls be developed to ensure that invoices are approved for only students properly placed at each school. This could include monthly verification and approval of the SETS data by the Placement Specialists as well distribution of placement/transfer documents to the staff responsible for SETS updates and invoice approval.

SPECIAL EDUCATION

The DCPS Special Education Division has made substantial progress in updating the data in

SETS. However, there continue to be errors. Because SETS is the system of record for special education, we obtained a download of the active students in SETS at October 7th. We merged it into the SIS data by matching student identification number and school. The following was noted in the SETS data:

- There were 5 students in SETS without a matching record in SIS for DCPS Schools
- There were 179 students in SETS without a matching record in SIS for Tuition Grant Schools
- 118 students had a funding level but no service hours
- 535 students had weekly service hours of 32 or greater

If SETS is to be considered the system of record for monitoring and reporting special education students, accuracy is paramount. Monthly reconciliations should be performed to ensure that data integrity is maintained. These reconciliation should include basic data checks, such as duplicate students, differences with SIS, and service level and hour anomalies.

The funding levels in SETS are based upon the Uniform Per Student Funding Formula (UPSFF). The UPSFF is based on weekly service hours.

Because the UPSFF does not adequately account for students receiving full-time special education

Funding Level	Weekly Service Hours
Level 1	Less than 6 hours
Level 2	> 6 hours and <= 15 hours
Level 3	More than 15 hours
Level 4	Separate School
Level 5	Residential

Current Funding Formula

Funding Level	Weekly Service Hours
Level 1	8 hours or Less
Level 2	> 8 hours and <= 16 hours
Level 3	> 16 hours and <= 24 hours
Level 4	> 24 hours
Level 5	Residential

Proposed Funding Formula



services but do not attend a special education school, legislation has been proposed to amend the funding formula, as shown below:

At the time of the audit, the proposed funding formula had not been enacted. Therefore, our report of special education students is based on the current formula. We have included a schedule showing the impact if the proposed legislation were passed (Attachment 12). This schedule is provided for informational purposes only.

Individual Education Plans

Training and written policies are needed regarding preparation of IEPs. These policies should include guidelines for:

- calculating the number of weekly services hours
- showing hours in the General Education Setting
- updating IEPs for transfer students, both another DCPS school, a charter school, or an out-of-state school
- amending, modifying, and correcting IEPs

SYSTEMS MAINTENANCE

Duplicates may not be Identified

As discussed earlier, there were numerous potential duplicate students based on name, grade, date of birth, and student ID. While MIS runs a duplicate student report, it is based on student ID only, the assumption being that the same student would not have two different IDs. However, we found instances in which the same person had different ID numbers or two different people had the same ID number. Some of the duplicates, or apparent duplicates, can be eliminated by:

- MIS providing ID numbers for public charter school students rather than having the charter school staff look up the number. Many of the duplicate ID pairings were stu-

dents enrolled in both DCPS and a charter school who were different people but had similar names, indicating that the number obtained by the charter school staff was for the wrong student. The combined DCPS and charter school data have over 240 pairs of students with the same ID who are different people.

- A periodic review of potential duplicate students based on information other than ID number.
- Coordination between MIS and the individual DCPS schools so that schools are notified when a charter school requests an ID for a current DCPS student, signaling that the student has transferred.
- Requiring public charter schools to obtain DCPS ID numbers. Students transferring to charter schools from schools other than DCPS schools do not always receive a DCPS student ID number. In some cases, students receive a charter school student ID number that is unique to that school. This charter school ID number would not remain with the student if the student transferred to another school. Without a single student ID number, there is a greater opportunity for the double counting of students. This is a repeat recommendation, and it has been implemented by most of the public charter schools.
- Developing a process that would put controls in place to ensure that the proper parties are notified and systems updated accordingly for students who transfer between schools.

Data Integrity Concerns for Special Education Students

In the census results, we have reported the total number of students for whom we saw IEPs and for whom we saw evidence of assessment of English proficiency. In comparing the results of our review with the Enrollment Data, numerous discrepancies were noted. For instance, there

	SETS	AUDIT
Level 1	1,315	1,178
Level 2	2,537	2,451
Level 3	3,697	3,591
Level 4	1,049	1,010
TOTAL	8,598	8,230

Table 9: Reconciliation to SETS

	DCPS	Tuition Grant
Students in SETS Download	8,598	2,631
Students not counted as enrolled	(205)	(238)
Enrolled students with no IEP, outdated IEP, or not special ed per principal	(315)	-
Students with current IEP not in SETS	152	
Students confirmed by schools not in SETS		90
TOTAL	8,230	2,483

Table 10: Reconciliation of SETS to Audit

were 770 students for whom the level derived by aligning the hours on the IEP with the UPSFF did not agree with the level in SETS. There were significantly more students for whom the hours in SETS did not match the IEP by more than 30 minutes. Differences less than 30 minutes were considered to be in agreement for the audit.

Data Integrity Concerns for Bilingual Education Students

The October 7, 2003 database of active bilingual education students provided by OBE contained 354 students who had no matching student ID in SIS. OBE reconciled the discrepancies, identifying 132 students with incorrect ID numbers and



222 who were inactive or otherwise not in SIS.

In an effort to accurately reflect the number of students receiving language services, we provided a listing of the students for whom we had seen proper documentation to OBE for comparison to the OBE database. OBE identified 424 language students whom we had not classified as LEP or NEP. Of the 424, we were able to match 241 to the audit records based on student ID. This difference would result from:

- Documentation not on file at the school
- Students being entered into the OBE system after October 7, 2003

Language evaluation is an on-going process. It is possible for students to have been in the process of being tested at October 7, 200 and, therefore, not yet in the system. Although not in the OBE System, the students required the services at October 7. Because the OBE system was the source for the documentation on file at the school, the download of the OBE system data was sufficient to verify LEP or NEP status, unless the principal had stated that the student was not LEP or NEP. Therefore, we classified an additional 234 students as LEP or NEP according to the updated data received from OBE.

During the resolution process, we were informed by some principals that certain students being shown in the OBE system as LEP/NEP are not students who receive language services. This could suggest errors in the data files, which have been noted. More importantly, however, it could suggest that qualified students are not receiving the required language services. This occurred for relatively few students, but it may warrant further investigation.



Glossary

Absent - Not in attendance on the day of the count. Students arriving during the physical count were not recorded as absent.

Audit Period - The census-type audit was conducted between October 7, 2003 and January 13, 2004, including the resolution period.

Census-type Audit - Determination of: the number of students enrolled in pre-school, pre-kindergarten, kindergarten, grades 1 through 12, and non-grade level programs in DCPS and special education students whose tuition for enrollment in other schools is paid with funds available to DCPS; the number of students who are District residents; the number of tuition-paying non-resident students; and the number of special education and English minority students as of October 7, 2003, based upon a physical headcount of students and review of applicable student records. This was not an audit conducted in accordance with generally accepted auditing standards.

Enrollment Classifications - For purpose of the audit, students were classified as:

Enrolled - A student was included in the enrollment count if he or she was:

- In the October 7, 2003, SIS data and present during the physical count
- In the October 7, 2003, SIS data and absent on the day of the physical count but documentation provided evidence of enrollment and attendance
- Not in the October 7, 2003, SIS data but present during the count and documentation provided evidence of enrollment on October 7.

Not Enrolled - A student was in the October 7, 2003, SIS data, but documenta-

tion provided showed evidence that the student had withdrawn or stopped or adequate documentation was not provided.

Enrollment Date - All data presented in this report is as of October 7, 2003.

LEP/NEP - Limited English Proficiency/No English Proficiency

Membership Report - Report issued by DCPS detailing student count entitled "SY 2003 - 04 Official Membership Report October 7, 2003".

Residency Classifications -

Verified - During the initial on-site file review, the student had a completed District Residency Verification Form, or applicable waiver, on file that had been properly approved. Otherwise, adequate proof of residency was provided during the resolution period.

Not Verified - There was no District Residency Verification Form on file or the form was incomplete, and adequate proof was not provided during the resolution period.

Resident Student - A student enrolled in a DCPS school who is 1) a minor whose parent, guardian, or other primary caregiver resides in the District of Columbia or 2) an adult who resides in the District of Columbia.

Resolution Period - Period after completion of the headcount and file reviews during which principals were provided an opportunity to resolve any outstanding issues.



School Types -

- Alternative: Special educational program that provides instruction to students under court supervision or on short- and long-term suspension from a regular DCPS academic program.
- Elementary - Preschool through grade 8
- Middle - Grades 5 through 8
- Junior High - Grades 7 through 9
- Senior High - Grades 9 through 12
- Special Education: separate school providing specialized services for students identified as having disabilities, as defined by law.

Special Education Tracking System (SETS) - System of record for placement and services provided to special education students. SETS interfaces with SIS through bridge software.

Student Information System (SIS) - The system of record for student enrollment and attendance. SIS is used as the basis for the Membership Report.

Tuition Grant - Special education students whose tuition for enrollment in other schools is paid with funds available to DCPS. These schools include non-public day and residential programs as well as public schools in surrounding counties serving District children under the care of D.C. Child and Family Services.

Uniform Per Student Funding Formula - Formula used to determine annual operating funding for DCPS pursuant to the School reform Act of 1995, as amended, and the Uniform Per Student Funding Formula for Public Schools and Public Charter School Act of 1998.

Weekly Service Hours - The number of hours of specialized education provided to a student each week in accordance with the Individual Education Plan (IEP).



Attachments

1. Summary of Audited Enrollment by School Type and Grade.
2. Audited Enrollment by School and Grade
3. Summary by School Type and Grade: Audited Enrollment vs. Reported Enrollment
4. Summary by School and Grade: Audited Enrollment vs. Reported Enrollment
5. Summary of Students for Whom Enrollment and Residency were Verified By School Type and Grade
6. Summary of Students for Whom Enrollment and Residency were Verified By School and Grade
7. Summary of Students for Whom Enrollment and Residency were Verified by School Type and Grade: Audited Enrollment vs. Reported Enrollment
8. Summary of Students for Whom Enrollment and Residency were Verified by School and Grade: Audited Enrollment vs. Reported Enrollment
9. Summary of Residency Verification by School
10. Summary of Students with IEPs, Including Students for Whom Residency was not Verified
11. Summary of LEP/NEP Students by School, Including Students for Whom Residency was not Verified
12. Summary of Students with IEPs, Including Students for whom Residency was not Verified: Aligned to Proposed Funding Formula Legislation
13. Summary of Students with IEPs for Whom Enrollment and Residency were Verified
14. Summary of LEP/NEP Students with Verified Residency
15. Summary of Tuition Grant Enrollment by School